

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

SHARLENE WOOLFORK-ROWLETT, )  
Plaintiff, ) Civil Action No. 3:13-00851  
v. ) Judge Hayes  
TYCO HEALTHCARE GROUP LP and ) Magistrate Judge Griffin  
COVIDIEN LP, ) JURY TRIAL DEMANDED *Amended*  
Defendants. ) *length of time*  
*complaint has*  
*restated as* *DENIED*

DEFENDANT COVIDIEN LP F/K/A TYCO HEALTHCARE GROUP LP'S  
MOTION FOR MORE DEFINITE STATEMENT

Defendant Covidien LP ("Covidien"), formerly known as Tyco Healthcare Group LP, *USM*  
*10-24-13*  
moves the Court for a more definite statement pursuant to Rule 12(e) of the *Federal Rules of*  
*Civil Procedure*. Plaintiff Sharlene Woolfork-Rowlett ("Plaintiff") alleges that she was  
implanted with a medical device manufactured by Covidien. (*See* Plaintiff's Complaint,  
Document No. 1, at ¶¶ 7, 14.) However, Plaintiff fails to state the basic information regarding  
(a) when the device was allegedly implanted, or (b) when she experienced her alleged injuries.  
In fact, the only information about Plaintiff's particular surgery is found at Paragraph 14, where  
Plaintiff claims that she "was implanted with IVS Tuneller Mesh System during surgery  
performed at Baptist Hospital in Nashville, Tennessee." (*Id.* at ¶ 14.) But, this does not provide  
any detail answering basic questions about the timing of her surgery or injury.

As a result of the lack of this basic information, the Plaintiff's Complaint is so vague or  
ambiguous that Covidien cannot reasonably prepare a response. Covidien respectfully requests  
that this Court issue an order pursuant to Rule 12(e) of the *Federal Rules of Civil Procedure* that  
Plaintiff file an Amended Complaint within fourteen (14) days identifying *both* the date of the